

PHILIP MORRIS U.S.A.

INTEROFFICE CORRESPONDENCE

120 PARK AVENUE, NEW YORK, N.Y. 10017

DATE: July 16, 1990

TO: Steve Parrish
FROM: Tom Borelli *TB*
SUBJECT: EPA Risk Assessment

Recently, we have made public statements challenging the conclusion and process by which the EPA has evaluated ETS. Our position is based on the fact that 18 of the 23 published studies lack statistical significance and the strength of the statistical association (expressed as relative risk) in these studies is far too weak to demonstrate a causal relationship. Furthermore, the EPA draft report fails to consider a number of recent studies that fail to find a statistically significant relationship between exposure to ETS and disease. The EPA study also does not provide animal evidence to support their conclusions.

In addition to releasing the ETS risk assessment, the EPA has issued a risk assessment on the claimed effects of electromagnetic fields (EMF). In this instance the EPA failed to classify the effects of EMF because of some very persuasive scientific reasons.

Attached is a side by side comparison of the scientific basis of the two risk assessments. A simple review of the two EPA reports illustrates a complete lack of consistency in the EPA risk assessment process. Hopefully, with such a compelling example of a "double standard", we will be able to demonstrate that the current EPA assessment of ETS is unfair, inconsistent and inaccurate.

cc: A. Millman
J. Nelson
T. Osden
M. Winokur

2021159841